

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

NAUTILUS INSURANCE COMPANY,

Plaintiff,

vs.

Richard Alexander Murdaugh, Sr., Cory Fleming,  
MOSS & KUHN, P.A., Chad Westendorf, and  
PALMETTO STATE BANK,

Defendants.

Civil Action No. 2:22-cv-1307-RMG

**DEFENDANT CORY FLEMING'S  
FINAL EXHIBIT LIST**

Defendant Cory H. Fleming ("Mr. Fleming") respectfully submits the following list of exhibits he intends to or may present at trial:

<b>Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
1	Nautilus "Personal Umbrella Liability Policy" issued to Mr. Murdaugh, Nautilus Cplt., Dkt. 154, Ex. A	
2	Murphy & Grantland memo dated July 11, 2018, Re: Don Bite Statute; NAUTILUS_000228_001, Grantland depo. Ex. 1	
3	Nautilus file memo, dated Oct. 2, 2018; NAUTILUS_000771-72, Grantland depo. Ex. 2	
4	Scott Wallinger, Esq. letter to Caitlin Crist and David Patrick, dated Nov. 6, 2018; NAUTILUS_002303-002314, Grantland depo. Ex. 5.	
5	Amy C. Miller email to John D. Grantland, Esq. dated Nov. 12, 2018; NAUTILUS_00255, Grantland depo. Ex. 3	
6	T. David Rheney, Esq. letter to Amy C. Miller dated Nov. 12, 2018; NAUTILUS_002323-002325, Grantland depo. Ex. 4	
7	John D. Grantland, Esq. letter to Amy C. Miller, dated Jan. 7, 2019; NAUTILUS_000296_001-002, Grantland depo. Ex. 7	
8	John D. Grantland, Esq. letter to Cory H. Fleming, Esq., dated Jan. 9, 2019; NAUTILUS_000325_001-002, Grantland depo. Ex. 8	
9	Amy C. Miller to John D. Grantland, Esq. email thread, dated	

Exhibit No.	Exhibit Description	Objections
	Jan. 29, 2019 to Feb. 15, 2019; NAUTILUS_000410-419, Grantland Ex. 11	
10	Amy C. Miller to John D. Grantland, Esq. email, dated Mar. 8, 2019; NAUTILUS_000554, Grantland Ex. 16	
11	John D. Grantland, Esq. letter to Amy C. Miller, dated Mar. 11, 2019; NAUTILUS_000508_001-002, Grantland Ex. 17	
12	Dr. Westerkam report, dated Mar. 11, 2019; NAUTILUS_002240, Grantland Ex. 19	
13	John D. Grantland, Esq. letter to Jon Austen, Esq., dated Mar. 14, 2019; NAUTILUS_000568-570, Grantland Ex. 18	
14	Amy C. Miller - John D. Grantland, Esq. email thread, dated Mar. 18, 2019; NAUTILUS_000577-578, Grantland Ex. 20	
15	John D. Grantland, Esq. email to Cory H. Fleming, Esq. and Scott Wallinger, Esq., dated Mar. 25, 2019, 12:14 PM; NAUTILUS_000593, Grantland Ex. 21	
16	<b>Settlement agreement, dated March 25, 2019; MOSS &amp; KUHN 128-130</b>	<b>?</b>
17	<b>Cory H. Fleming, Esq. letter to John D. Grantland, Esq. – enclosing executed Release, dated April 11, 2019; CHF_00082-85</b>	<b>?</b>
18	John D. Grantland, Esq. letter to Cory H. Fleming, Esq. dated Apr. 22, 2019, enclosing \$3,800,000 settlement proceeds check; M&G000020-21, Grantland Ex. 30	
19	John D. Grantland, Esq. email to Amy C. Miller dated May 6, 2019; NAUTILUS_000678-679, Grantland Ex. 32	
20	John D. Grantland, Esq. - Amy C. Miller email thread, dated May 10, 2019; NAUTILUS_000681-682, Grantland Ex. 33	
21	Cory H. Fleming, Esq. email to John D. Grantland, Esq. with digital copy of original Order, dated May 13, 2019; CHF_00015, M&G Second Sup to Second ODC Sub 026, Grantland Ex. 39	
22	Cory H. Fleming, Esq. letter to John D. Grantland, Esq. with the original Order, dated May 13, 2019; CHF_00411, M&G SUPP TO SECOND ODC SUB 025, Grantland Ex. 34	
23	Order Approving Settlement, dated May 13, 2019; NAUTILUS_002286-002289, Grantland Ex. 35 <u>or</u> M&G000045-000048	

<b>Exhibit No.</b>	<b>Exhibit Description</b>	<b>Objections</b>
24	John D. Grantland, Esq. email to Amy C. Miller dated May 13, 2019, 5:49 PM EST; M&G001935 and M&G000045-048	
25	John D. Grantland, Esq. email to Amy C. Miller, dated May 14, 2019 6:10 AM, Grantland Ex. 36	
26	Law clerk to Hon. Carmen T. Mullen email to Murphy & Grantland paralegal, dated June 13, 2019; M&G001960, Grantland Ex. 37	
27	Satterfield Settlement Agreement and Mutual Release (with redacted settlement amount), Fleming_00001-00026	Relevance, FED. R. EVID. 401 and 402
28	United States of America vs. Cory Howerton Fleming, Information filed May 23, 2023 U.S. District Court Criminal No.: 9:23-cr-00394-RMG, Fleming_00026-00034	Relevance, FED. R. EVID. 401 and 402
29	Superseding Indictment for Obtaining Signature of Property by False Pretenses, Money Laundering, Computer Crime, Criminal Conspiracy, False Statement or Misrepresentation, and Breach of Trust with Fraudulent Intent,” in a state court action 2021-GS-47-30	Relevance, FED. R. EVID. 401 and 402

Pursuant to Fed. R. Civ. P. 26(a)(3), the list of exhibits does not include those exhibits which may be needed for impeachment. Mr. Fleming may introduce additional exhibits of any documents that Plaintiff produced and those produced by any party during the course of discovery or marked at any deposition as exhibits, as well as any exhibit identified by Plaintiff or any other Defendant and reserves the right to do so and to supplement this list as appropriate.

Respectfully submitted,

/s/ Thomas A. Pendarvis

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December 23, 2024